

FREEDOM OF INFORMATION COMMISSION
OF THE STATE OF CONNECTICUT

In the Matter of a Complaint by

FINAL DECISION

Mark Chylinski,

Complainant

against

Docket #FIC 2025-0798

Executive Director, State of
Connecticut, Commission on Human
Rights and Opportunities; and State of
Connecticut, Commission on Human
Rights and Opportunities,

Respondents

August 12, 2026

The above-captioned matter was heard as a contested case on March 26, 2026, at which time the complainant and the respondents appeared, stipulated to certain facts, and presented testimony, exhibits and argument on the complaint.

After consideration of the entire record, the following facts are found and conclusions of law are reached:

1. The respondents are public agencies within the meaning of §1-200(1), G.S.
2. It is found that on August 22, 2025, the complainant went to the respondents' office and requested to inspect the file for "case number 2510322." It is found that the respondents provided the complainant access to such file and he was able to review the records contained therein.
3. It is found that during his inspection of the file for case number 2510322, the complainant orally requested that the respondents provide him with copies of the records contained in that file. It is found that the respondents did not provide him with the copies of the records he requested at that time.
4. By complaint received and filed on September 4, 2025, the complainant appealed to this Commission alleging that the respondents violated the Freedom of Information ("FOI") Act when they denied his August 22, 2025 request for "copies of documents in case file number 2510322."

5. Section 1-200(5), G.S., provides:

“[p]ublic records or files” means any recorded data or information relating to the conduct of the public’s business prepared, owned, used, received or retained by a public agency, or to which a public agency is entitled to receive a copy by law or contract under section 1-218, whether such data or information be handwritten, typed, tape-recorded, videotaped, printed, photostated, photographed or recorded by any other method.

6. Section 1-210(a), G.S., provides in relevant part that:

[e]xcept as otherwise provided by any federal law or state statute, all records maintained or kept on file by any public agency whether or not such records are required by any law or by any rule or regulation, shall be public records and every person shall have the right to (1) inspect such records promptly during regular office or business hours . . . or (3) receive a copy of such records in accordance with section 1-212.

7. It is concluded that the records described in paragraph 2, above, to the extent they exist and are maintained by the respondents, are public records within the meaning of §§1-200(5) and 1-210(a), G.S.

8. With respect to requests for copies of public records, §1-212(a), G.S., provides, in relevant part, that “[a]ny person ***applying in writing*** shall receive, promptly upon request, a plain, facsimile, electronic, or certified copy of any public record.” (Emphasis added).

9. In Planning and Zoning Comm’n of the Town of Pomfret v. Freedom of Info. Comm’n, 130 Conn. App. 448, 456 (2011), the Connecticut Appellate Court concluded that “[t]he language of §1-212(a) clearly and unambiguously requires that an individual seeking to receive a copy of a public record, such as in the present case, must reduce the request to writing in order for the request to be enforceable by the commission.”

10. At the March 26, 2026 hearing on this matter, the complainant testified and, it is found, that he never submitted a written request for copies of the records described in paragraphs 2 through 4, above.

11. Based on the foregoing, it is concluded that, because the complainant never made a written request for copies of the records described in paragraphs 2 through 4, above, the respondents did not violate the FOI Act as alleged.¹

The following order by the Commission is hereby recommended on the basis of the record concerning the above-captioned complaint:

¹ At the March 26, 2026 hearing on this matter, the complainant indicated that approximately two weeks after he made his August 22, 2025 oral request, the respondents provided him with hard copies of records from the requested file. While the complainant expressed his dissatisfaction with the manner in which he received such records, such issue is not before the Commission as the complainant never requested copies of such records in writing.

1. The complaint is hereby dismissed.

Approved by Order of the Freedom of Information Commission at its regular meeting of August 12, 2026.

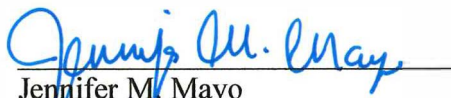

Jennifer M. Mayo
Acting Clerk of the Commission

PURSUANT TO SECTION 4-180(c), G.S., THE FOLLOWING ARE THE NAMES OF EACH PARTY AND THE MOST RECENT MAILING ADDRESS, PROVIDED TO THE FREEDOM OF INFORMATION COMMISSION, OF THE PARTIES OR THEIR AUTHORIZED REPRESENTATIVE.

THE PARTIES TO THIS CONTESTED CASE ARE:

MARK CHYLINSKI, 35 Santo Court, New Britain, CT 06053

EXECUTIVE DIRECTOR, STATE OF CONNECTICUT, COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES; AND STATE OF CONNECTICUT, COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES, c/o Attorney Renee Vanden Wall Bake, Commission on Human Rights and Opportunities, 450 Columbus Boulevard, Suite 2, Hartford, CT 06103


Jennifer M. Mayo
Acting Clerk of the Commission